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VIA ECF

Honorable Magistrate Judge Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *A.G., individually and on behalf of A.G.C., v. N.Y.C. Dep't of Educ.*,
1:21-cv-02702-ALC-KHP

Dear Judge Parker,

I am the attorney for the Plaintiffs in the above-referenced action, wherein Plaintiff seeks attorneys' fees incurred in the administrative proceeding under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.*, as well as the instant federal action.

10/14/2021

The parties do not anticipate discovery in this matter, as Plaintiff has already provided the Defendant with billing invoices for the claim for attorneys' fees and costs.

I write jointly with Defendant's counsel to submit a case management plan and to propose a briefing schedule pursuant to the Court's September 29, 2021, Scheduling Order (Dkt. 19). As the parties are optimistic that this matter will be resolved through settlement, the parties jointly propose that the Court adjourn the pretrial conference scheduled for August 16, 2021, sine die and order the following briefing schedule:

October 21, 2021

- Plaintiff's motion for summary judgment will be due on December 8, 2021.
- Defendant's opposition will be due on January 12, 2022.
- Plaintiff's reply will be due on January 21, 2022.

The briefing schedule proposed above will afford the parties additional time for settlement negotiations. At this time, the parties believe that they can resolve the matter without further Court intervention. In the event the parties reach a point in settlement negotiations where the parties believe a settlement conference would aid and advance settlement, the parties will write the Court to request a settlement conference before the Magistrate Judge.

Respectfully submitted,

s/ Erin E. Murray

cc: Howard Krebs (via ECF)
Attorney for the Defendant